

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-192-E**

In re:

Dominion Energy South Carolina,  
Incorporated Coal Retirement Docket  
Opened Pursuant to Commission Order  
No. 2021-418

**PETITION TO INTERVENE**

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On June 9, 2021, Commission staff opened this docket pursuant to Commission Order No. 2021-418 and requested that any person who wishes to participate can file a Petition to Intervene with the Commission and “advise the Commission on an appropriate procedural schedule along with any statutory or regulatory deadlines that might need to be addressed.”

2. The Commission has not yet issued a scheduling order in this case; however, the deadline for parties to file a Notice of Intervention is August 2, 2021; therefore, this Petition to Intervene is timely.

3. Sierra Club is a nonprofit conservation organization incorporated in California. It currently represents almost 800,000 dues-paying members nationwide and approximately 6,920 dues-paying members in South Carolina. The Club’s mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth’s ecosystems

and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club and the Sierra Club's South Carolina Chapter work to accelerate the transition from fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

4. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, docket nos. 2020-125-E, 2019-226-E, 2018-322-E, 2018-321-E, 2018-319-E, 2018-318-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

5. Sierra Club and its more than 6,920 members who live in South Carolina—approximately half of which are Dominion customers—have a direct and substantial interest in this proceeding. The Sierra Club was an active participant in Dominion Energy South Carolina's 2020 IRP, Docket No. 2019-226-E, submitting expert testimony pointing out the flaws in DESC's modeling and capital cost assumptions, along with performing our own modeling demonstrating that a coal retirement resource portfolio was a more reasonable and prudent path forward for DESC and its customers. Order No. 2020-832 in Docket No. 2019-226-E stated that

“the Commission is opening a new docket to assess the retirement and replacement of the Company's coal plants. This proceeding will evaluate the reliability risks and environmental costs of continued operation of the coal plants as well as options, informed by resource bids, to replace legacy coal technology with state-of the-art clean energy.”

Order No. 2020-832 at 30.

6. The Commission's opening of a coal docket implicates Sierra Club's organizational mission and interests by establishing a forum where the parties can discuss a procedural schedule for the Wateree and Williams retirement analyses, the retirement of the plants pursuant to Dominion's 2020 Modified IRP along with the replacement of those coal plants with clean energy solutions informed by resource bids. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings.

7. Sierra Club and its members have an interest in ensuring the timely retirement of the Wateree and Williams coal plants and advancing the important objectives of promoting cost-saving clean energy, energy efficiencies, and distributed generation, and avoid disproportionate and unreasonable burdens on low-income South Carolinians. No other party will adequately represent Sierra Club's interests in this case.

8. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Company's CT Plan. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

9. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

10. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:


Robert Guild  
314 Pall Mall Street  
Columbia, SC 29201  
Tel: (803) 917-5738  
Email: [bguild@mindspring.com](mailto:bguild@mindspring.com)

11. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record and:

Dori Jaffe (*Pro Hac Vice Motion pending*)  
50 F St NW, 8<sup>th</sup> Floor  
Washington, DC 20001  
Tel: (202) 675-6275  
Email: dori.jaffe@sierraclub.org

WHEREFORE, Petitioners request that they be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this 28th day of June, 2021.

  
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On behalf of  
Robert Guild  
S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, SC 29201  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-192-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic mail on this 28th day of June, 2021.

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On behalf of

Robert Guild